

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

vs.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA,

Defendant.

Case No. 4:20-cv-03081

**DEFENDANT'S
MOTION FOR LEAVE TO FILE
RESTRICTED ACCESS DOCUMENTS**

Defendant Board of Regents of the University of Nebraska ("BRUN"), pursuant to NECivR 5.3(C)(1), moves the Court for leave to file restricted access documents in support of their Motions for Summary Judgment and to Exclude Expert Testimony (Daubert). In support of this motion, Defendant states:

1. The Court has entered an Order and Protective Order allowing Doe 1 and 2 to proceed under pseudonym and to designate matters documents and materials subject to disclosure as confidential. [Filing No. 70.]

2. In support of Defendant's Motion for Summary Judgment and Motion to Exclude Plaintiffs' Experts, Defendant is filing briefing and exhibits, including discovery material marked confidential, or documents that reflect information from materials marked confidentially.

3. Such confidential documents and materials are necessary evidence to support Defendant's arguments in support of their Motions.

4. Because the documents themselves are protected as confidential or reflect confidential information, redaction would insufficiently protect the documents as required by the Court's Protective Order.

5. Except for Exhibit P (Student Code of Conduct), all of the evidence submitted by Defendant is confidential documents that ought to be restricted.

6. Therefore, Defendant has filed the entire Combined Index of Evidence and all sub-filings as an “other filing”. Defendants request the clerk of the court restrict access to all exhibits, except Exhibit P.

WHEREFORE, Defendant respectfully requests leave of the Court to file restricted access the documents identified above in support of their Motions.

DATED this 3rd day of September, 2024.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA, Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties.

/s/ Lily Amare
Lily Amare